

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-MJ-384 (HB)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	JOINT MOTION OF THE PARTIES
	)	FOR EXTENSION OF TIME FOR
MONTEZ TERRIEL LEE,	)	FILING INDICTMENT
	)	
Defendant.	)	

The United States of America by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Assistant United States Attorney Thomas Calhoun-Lopez, and Defendant Montez Terriel Lee, by his attorney Andrew S. Garvis, Esq., jointly move the Court pursuant to 18 U.S.C. '3161(h) for a thirty-day extension of time for filing the indictment in the above-captioned matter. The grounds for this motion are as follows:

1. Lee was arrested on a federal complaint on June 16, 2020. (Document No. 3.) An initial appearance in this matter also took place on June 16, 2020, at which time the United States made its motion for detention. (*Id.*)
2. Lee was ordered detained pending a preliminary hearing and detention hearing. (Document No. 4.)
3. A preliminary and detention hearing was held before Magistrate Judge David T. Schultz on June 18, 2020. Lee ordered detained. (Document No. 11.)

4. Excluding the time while the United States's motion for detention was pending, pursuant to 18 U.S.C. ' ' 3161(b) and 3161(h), an indictment must be filed by July 18, 2020.


5. In the view of the parties, a 30-day extension of the period in which the United States is required to bring the matter before the grand jury serves the interests of the Defendant, the public, and justice as well as promoting judicial economy. The parties are in the process of exchanging information about the allegations in the Complaint and discussing whether pre-indictment proceedings may be appropriate. The efforts to exchange information and discuss possible pre-indictment proceedings would be unduly limited without the requested extension.

6. Counsel for Defendant has consulted with Defendant about this extension request, and Defendant consents to the request and agrees that any period of delay is excluded from the calculation of time under the Speedy Trial Act.


For the foregoing reasons, the parties respectfully and jointly request that the motion for a 30-day extension of time for filing the indictment in the above-captioned matter be granted. A proposed order accompanies this motion.

Dated: 7/08/2020


ERICA H. MacDONALD  
United States Attorney

  
BY: THOMAS CALHOUN-LOPEZ  
Assistant United States Attorney

Dated: 7/8/20

  
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MONTEZ TERRIEL LEE  
Defendant

Dated: 7-8-20

  
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ANDREW S. GARVIS, ESQ.  
Counsel for Defendant